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To: Centers for Medicare and Medicaid Services  
From: SEIU Healthcare 1199NW

Date: October 9, 2015

Re: Washington State Section 1115 Medicaid Waiver Demonstration  
Application

SEIU Healthcare 1199NW, an organization of 26,000 nurses, healthcare, mental health and state employee workers across Washington state, is pleased to submit these comments in support of the Washington state application for a Section 1115 Medicaid Waiver Demonstration. We believe the initiatives outlined in this application will bolster the collaborative work underway in our state to promote the triple aim – not only among specific groups that will benefit from revised long-term services and supports, supported employment services and supported housing services – but among people throughout Washington state.

#### Initiative 1: Transformation through Accountable Communities of Health

Accountable Communities of Health (ACHs) represent great potential for local, collaborative health innovation. We appreciate the state's intention to develop greater capacity, structure and role clarity for ACHs before ACHs become an avenue for disbursing substantial community resources. We are eager to collaborate with local partners on a detailed plan to ensure ACHs are prepared for their expanding role in healthcare reform.

We are pleased to see that one of the transformation project domains, Health Systems Capacity Building, will direct ACH investments to workforce development. Our organization has had success in labor-management partnership models for workforce development. One example is The Multi-Employer Training Fund. This labor-management Taft-Hartley Trust is funded by collectively-bargained employer contributions and provides education and training benefits to eligible union members. Governed by labor and management trustees, the Fund's work supports healthcare workers, employers and educational systems. The Fund helps over 1,500 healthcare workers annually to improve their skills, advance their careers and make a better life for themselves and their families. The Fund helps partner employers address their workforce needs, for example by helping 70% of Training Fund members pursue a nursing pathway and diversifying the workforce: in 2014, 54% of members enrolled in school through the Training Fund were people of color.



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Lastly, the Fund works to transform the training and education system to be more responsive to the needs of the healthcare industry and its workforce.

### Initiative 3: Provision of Targeted Foundational Community Supports

We strongly support expanded funding for supportive housing services. This feature of the waiver offers an exciting opportunity to make critical investment in behavioral health services, particularly as the state works to integrate our disproportionately funded behavioral and physical health systems. The state makes extensive local investments that can be matched by federal investment. Increased resources will ensure that our state is able to cover the costs of best practices in outreach, wrap-around services, and treatment programs – critical services that will help Washingtonian patients avoid the most costly and intensive interventions. We need these front-end community investments – both as front-line caregivers in Washington’s community behavioral health system and also as the in-patient caregivers in emergency departments and psychiatric hospitals.

Please contact Sybill Hyppolite, Healthcare Policy Specialist, at 425.306.6508 or [sybillh@seiu1199nw.org](mailto:sybillh@seiu1199nw.org) with any questions or comments.